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Via Electronic Filing

The Honorable Barbara Moses, U.S.M.J.
United States District Court, Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Lopez v. Thermo Tech Mechanical, Inc. et al.*
Case No.: 20-cv-9113-LTS-BCM

Dear Honorable Magistrate Judge Moses:

This law firm represents Defendants Thermo Tech Mechanical Inc. and Gowkarran Budhu (together, the “Defendants”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules, the following letter serves to respond to the letter motion filed by Plaintiff Juan Lopez (the “Plaintiff”) on September 25, 2023 (the “September 25th Letter Motion to Compel”).

Simultaneously herewith, the undersigned has served Plaintiff’s counsel with supplemental disclosures under Federal Rule of Civil Procedure (“Fed.R.Civ.P.”) 26(a).

Contrary to the assertions in the September 25th Letter Motion to Compel, Plaintiff’s counsel has never met-and-conferred with the undersigned regarding Defendants’ responses to Plaintiff’s First Request for Interrogatories. Defendants’ responses were served on or around **June 16, 2021**, *i.e.*, over two (2) years ago. Since then, Plaintiff has not raised a single issue regarding the propriety of Defendants’ responses and objections. Subject to, and notwithstanding the foregoing, Defendants are prepared to verify their responses to Plaintiff’s First Request for Interrogatories on or before October 4, 2023.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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